

**SAS Pittsfield, Inc.
Somerset County
Pittsfield, Maine
A-443-71-F M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

After review of the air emissions minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

SAS Pittsfield, Inc. (SAS) of Pittsfield, Maine, was issued air emission license A-443-71-E-A/R on June 20, 2001, permitting the operation of emission sources associated with their shoe manufacturing facility.

License A-443-71-E-A/R is silent on the tons of a single HAP which the facility may emit; it only states facility wide HAP emissions shall not exceed 6.0 tons facility wide. SAS has requested a single HAP limit of 6.0 tons per year be specified in the license and a revised facility wide HAP limit of 11.0 tons per year. This application is being process as a minor revision based upon the fact that the increased emissions of a single HAP is less than 4.0 tons per year and the increase in total HAP emissions is less than 8.0 tons per year.

B. Revised Annual Emissions

SAS has the following emissions, based on a 12 month rolling total:

- 239,000 gallons per year #5 fuel oil, 2.0% sulfur by weight maximum.

Total Annual Emissions for the Facility
(used to calculate the annual license fee)

Pollutant	Boilers	Spray Booths	Adhesive/Top Coat	Tons/Year
PM	3.3	--	--	3.3
PM ₁₀	3.3	--	--	3.3
SO ₂	37.5	--	--	37.5
NO _x	6.7	--	--	6.7
CO	0.6	--	--	0.6
VOC	0.1	5.0	10.0	15.1
Single HAP	--	--	6.0	6.0
Total HAP	--	--	11.0	11.0

II. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for an amendment shall be determined on a case-by case basis. Based on the total facility emissions, SAS is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License amendment A-443-71-F-M, subject to the conditions in Air Emission License A-443-71-E-A/R and the following conditions:

The following shall replace Condition (18) of license A-443-71-E-A/R:

(18) Adhesive and Top Coat Process [MEDEP Chapter 115, BPT]

- A. Single HAP emissions from the Adhesive and Top Coat processes shall not exceed 6.0 tons per year and total HAP emissions from the Adhesive and Top Coat processes shall not exceed 11.0 tons per year (both based on a 12 month rolling total). Compliance will be based on records showing the quantity of product used and the percent HAP by weight in each product.
- B. VOC emissions from the Adhesive and Top Coat processes shall be less than 10 tons per year (based on a 12 month rolling total). Compliance will be based on records showing the quantity of product used and the percent VOC by weight in each product.

The following are new conditions to license A-443-71-E-A/R:

- (21) SAS shall pay the annual air emission license fee within 30 days of **September 30th** of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.
[MEDEP Chapter 115, BPT]

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- (22) The term of this Order shall be for five (5) years from the signature below.
[MEDEP Chapter 115]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 24, 2003

Date of application acceptance: October 28, 2003

Date filed with the Board of Environmental Protection: _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality